



2. Pursuant to Federal Bankruptcy Rule 7012, the deadline for the Defendant to file an answer or otherwise respond to the Complaint is August 13, 2020.

3. The Trustee seeks an extension of that deadline for 90 days until October 12, 2020, to allow the Trustee and the Defendant time to potentially resolve the issues without either party incurring attorney's fees and costs of litigation.

**WHEREFORE**, the Trustee respectfully requests that the Court enter an order extending the answer deadline from August 13, 2020 until October 12, 2020, and for such other and further relief, at law and in equity, as this Court deems just.

Dated: July 17, 2020

Respectfully submitted,

**BARRON & NEWBURGER, P.C.**

/s/R. J. Shannon

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7 Trustee for Koontz-Wagner Custom Control  
Holdings LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2020, I caused a true and correct copy of the foregoing to be served on the Defendant's Registered Agent by regular first class mail at the following address:

Industrial Climate Engineering, A Division of Airxcel, Inc.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

/s/R. J. Shannon

R. J. Shannon

